

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: February 22, 2024 at 1:00 P.M. ET

Objection Deadline: February 9, 2024 at 4:00 P.M. ET

Ref. Nos. 6284 & 6289

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' THIRTEENTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On January 23, 2024, the Debtors filed the *Debtors’ Thirteenth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)* [D.I. 6284, redacted & 6289, sealed] (the “Objection”).

2. Pursuant to the *Notice of Objection* attached to the Objection [D.I. 6284-1 & 6289-1], any responses to the Objection were to be filed no later than February 9, 2024, at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. On February 6, 2024, Mai Nguyen (“Mai Nguyen”) filed a response to the Objection [D.I. 7061] (the “Mai Nguyen Response”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. On February 6, 2024, Thi Nguyen filed a response to the Objection [D.I. 7077] (the “Thi Nguyen Response”).

5. On February 8, 2024, Fabio Krishna Ames filed a response to the Objection [D.I. 7172] (the “Ames Response”)

6. On February 9, 2024, the Hansen Family Trust filed a response to the Objection [D.I. 7217] (the “Hansen Response” and, collectively with the Mai Nguyen Response, Thi Nguyen Response and Ames Response, the “Formal Responses”).

7. Additionally, the Debtors received informal responses (the “Informal Responses”) to the objection from the holders of claim number 650 and claim number 17892.

8. As of the Date hereof, no other formal objections or other responses to the Objection have been filed or served on the Debtors, besides the Formal Responses and Informal Responses.

9. The Debtors have resolved the Informal Response from the holder of claim number 17892 with no changes to the proposed form of order attached to the Objection (the “Proposed Order”).

10. The parties have agreed to adjourn the Objection with regard to proof of claim number 650, as well as to the claim of the Hansen Family Trust.

11. Based on the Debtors’ review of the Informal Responses and the Formal Responses and discussions with certain of the claimants, the Debtors are withdrawing the Objection solely with regard to the claims of Mai Nguyen, Thi Nguyen and Fabio Krishna Ames, without prejudice and with all rights of the parties reserved with regard thereto.

12. The Debtors have revised the Proposed Order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournments and withdrawals. A copy of the

Revised Order compared against the Proposed Order is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”), who have confirmed that they have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

13. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: February 22, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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